

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

Patricia Burnelle, on behalf of herself
and all others similarly situated,

Plaintiffs,

v.

Sage Home Loans Corporation f/k/a
Lenox Financial Mortgage Corporation
d/b/a Weslend Financial,

Defendant.

Civil Action No.: 0:24-cv-00972-MGL

**SECOND CONSENT MOTION FOR
EXTENSION**

The Defendant Sage Home Loans Corporation f/k/a Lenox Financial Mortgage Corporation d/b/a Weslend Financial, and the Plaintiff, Patricia Burnelle, by and through their respective undersigned attorneys, hereby move pursuant to Rule 6(b)(1)(A), Federal Rules of Civil Procedure, for a second extension of time to answer, plead, or otherwise respond to the complaint in the above captioned matter until and through June 3, 2024, which is thirty (30) days from the date the response is now due.

The current deadline to answer is May 3, 2024. The parties initially jointly moved before the Court on March 15, 2024 for a first extension of time to allow the Defendant to answer sixty days after service. (ECF #11). The reason for the first motion was ongoing settlement discussions. The Court granted the motion by text order of March 18, 2024. (ECF #12.)

The parties respectfully request another thirty day's (30) extension until and through June 3, 2024 for the defendant to respond to the Complaint. This motion is made for good cause, as the parties have been actively engaged complex settlement negotiations with the possibility of early resolution for the putative class.

WHEREFORE, the parties prays that the Court grant this Motion for an extension until and through June 3, 2024.

Respectfully submitted,

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May 1, 2024
Columbia, South Carolina